



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Inspection Date 7/12/02Time Start 12:50 pmTime Finish 2:00 pm

HAZARDOUS WASTE INSPECTION REPORT



GENERATOR



S Q GENERATOR

Company name B. Braun Medical, Inc. I.D. Number PAD 982679169Site Address 901 Marcon Blvd. Allentown, PA 18109 - 9341County Lehigh Municipality Hanover Twp. Zip 18109Name of Inspector Chris SmolarName & Title of Responsible Official Steve Stancick Environmental, Health, and Safety ManagerPerson Interviewed David Lauer / Joe Patterson Telephone (610) 266-0500 x2584 / x2454Mailing Address (if different from above) SameAmount of Hazardous Waste Generated per Month: >2200 Pounds Kgs

1. Site Characterization:

STORAGE: ☒ Container ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad Other PBR: ☐ Neutralization/WWTP ☐ Reclaim (silver) Other GENERATOR TREATMENT ☐ Containers ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad2. Universal Waste: ☐ Large Quantity Handler ☐ Small Quantity HandlerUniversal Waste Types Fluorescent Lamps

3. Hazardous Waste Transporters:

Transporter Name Freehold Cartage License Number PA-AH 0067Transporter Name Dart Trucking License Number PA-AH 0219Transporter Name Safety Kleen Systems License Number PA-AH 0172

4. Types of hazardous waste generated and destination facility (location & type).

Waste Code	Waste Description	Destination Facility
D001, F002, F003	Waste flammable solids and liquids (solvents)	Environmental Enterprises
D001, F002, F003	Waste flammable solids and liquids (solvents)	Von Roll of America
D001, D002, F002	Lab Wastes	Permafrix

NERO
BDO
EPA - RCRA
Municipality - Hanover Twp.
Facility - B. Braun Medical

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HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS

Site Name B. Braun Medical, Inc. ID Number PAD 982679169 Date 07/12/02

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1 2 3 4

REQUIREMENTPA CIT.
25 PA CodeFED. CIT.
40 CFRLINE
NO.

1				Hazardous waste determination performed on all waste streams	262a.10	262.11	H001
1				Identification Number	262a.10	262.12	H002
1				Authorized transporters only	262a.10	262.12(c)	H003
1				Subsequent notification requirements met	262a.12(b)		H004
1				Proper manifest used	262a.10	262.21	H005
1				Manifests filled out correctly and completely	262a.20		H006
1				Manifests signed and routed properly	262a.23(a)	262.23	H007
1				Generator waste accumulated on site for 90 days or less	262a.10	262.34(a)	H008
	2			SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262a.10	262.34(e)(f)	H009
	2			SQG waste accumulated on-site never exceeds 6000 kg	262a.10	262.34(e)(f)	H010
1				Satellite accumulation requirements complied with	262a.10	262.34(c)	H011
1				Personnel training program per 265.16 complied with	262a.10	262.34(a)(4) 262.34(d)	H012
1				Manifest exception and biennial reports retained for 3 years	262a.10	262.40(a)(b)	H013
1				Specified records retained for three years	262a.10	262.40(c)	H014
1				Biennial reports submitted to the Department (LQG only)	262a.41	262.41	H015
1				Exception reporting procedures followed	262a.42	262.42	H016
1				Spill reporting procedures followed	262a.10	262.34(d)	H017
1				PPC plan developed and implemented	262a.10	262.34(a)	H018
1				Special requirements followed for international shipments	262a.10	262.50 262.60	H019
1				Source reduction strategy prepared and available (LQG only)	262a.100		H020
1				Excluded waste complies with exclusionary requirements	261a.4	261.4	H021

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**HAZARDOUS WASTE INSPECTION REPORT
GENERATORS -- SMALL QUANTITY GENERATORS
FACILITY SPECIFICS**

Site Name B. Braun Medical, Inc. ID Number PAD 982679169 Date 07/12/02

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1 2 3 4

REQUIREMENT

PA CIT.
25 PA Code

FED CIT.
40 CFR

LINE
NO.

					CONTAINERS (Subchapter I)		
1					Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I	262a.10	262.34 H025
1					Containers of hazardous waste in good condition	265a.1	265.171 H026
1					Containers and stored waste compatible	265a.1	265.172 H027
1					Containers kept closed except during addition or removal of wastes	265a.1	265.173(a) H028
1					Containers managed to prevent leaks	265a.1	265.173(b) H029
1					Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment	265a.173	H030
1					Container storage areas inspected at least weekly	265a.1	265.174 H031
1					Special requirements for ignitable or reactive and incompatible waste complied with	265a.1	265.176-177 H032
1					Proper containment and collection systems in place	265a.179	H033
1					Air emission standards complied with (AA, BB, CC)	265a.1	265.178 H034
1					Containers clearly marked with accumulation date and visible for inspection	262a.10	262.34(a)(2) H035
1					Containers labeled "Hazardous Waste"	262a.10	262.34(a)(3) H036
1					Containers labeled accurately identify contents	SWMA 6018.403(b) (2)	H037

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INSPECTION REPORT COMMENTS

Date of inspection July 12, 2002 Identification Number PAD 982679169
Company/Facility/Site Name B. Braun Medical, Inc.

Observations:

I conducted a routine hazardous waste generator inspection on 07/12/02 at B. Braun Medical, Inc. David Lauer and Joe Patterson of B. Braun were present during the inspection. The inspection began at 10:50 am.

The facility manufactures medical equipment. The facility generates hazardous and residual wastes during this process. The facility main generates used solvents as hazardous waste. The facility also generates lab waste. The facility's hazardous waste include, but are not limited to, Isopropanol, Methylene Chloride, Ethanol, Butyl Acetate, TCE, and Phenol. The facility generates liquid hazardous waste, and some solid wastes, which mostly include protective equipment.

Two containers of hazardous waste were observed inside. In what appeared to be an accumulation area, and several drums were observed outside in a hazardous waste storage area. Both areas had secondary containment. Drums were properly labeled with dates. The drums were in good condition. The drums should be labeled with the name of the hazardous constituent whenever possible. Some of the drums just had a description of the waste type. The storage shed was equipped with fire systems. The containment pad outside had a couple of very small cracks, but these should be patched before they grow bigger.

The PPC plan was examined. The plan appears to be adequate. Manifests were examined and appear to be in order. The training documents were examined. The facility has submitted its biennial reports (hazardous). A copy of the LDR was seen attached to one of the manifest shipments.

No violations were noted during the inspection.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) Sent to Facility Date 7/16/02
Inspector (signature) Christopher Anichini Date 7/16/02

EVALUATION - VIOLATION - ENFORCEMENT FORM

07/97 VERSION

Handler ID Number: PA 0982679169

RCRA Non-Notifier YES [] NO [X]

If YES, the handler section must be completed.

Handler Name: B. Braun Medical, Inc.

Street: 901 Marcon Blvd.

City: Allentown

State: PA

Zip Code: 18109

County or County Code: Lehigh

Contact: Stephen Stencick

UNIVERSE CHANGE REQUIRED YES [] NO [X] or Indicate Universe Status of the RCRA Non-Notifier

I. Indicate the facility's current Universe(s):

LQG

III. Indicate the new transporter status:

II. Indicate the new RCRIS Generator Universe:

LQG [] SQG [] CEG []

NON-HANDLER []

CLOSED []

NOTE: All TSD activities changes must be handled by the state data coordinator and cannot be made using this form.

Transporter []

Non-Transporter []

You must check at least one of the boxes

Mark Mode of Transportation

[] Air [] Water
[] Rail [] Other
[] Highway

Check this box if the facility is currently listed in RCRIS as a transporter and no longer transports hazardous waste.

EVALUATION Add [X] Change Delete

Date	Number	Agency	Type	Reason	Branch	Person
<u>07/12/02</u>		<u>C</u>	<u>C.F.I</u>			<u>P.A.C.S.S</u>

AREAS OF EVALUATION (E - Evaluated NE - Not Evaluated NA - Not Applicable)

GGR <u>E</u>	GSC	TWD	DGW	DOR	DWP	BRR	FEA
GLB <u>E</u>	GSQ	DCH	DLB	DPB	DIN	BPS	CSS
GMR <u>E</u>	GEX	DCL	DLF	DPP	DIA	BIS	UOR
GOR <u>E</u>	TGR	DCP	DLT	DSI	DPS	BCE	SCC
GPT <u>E</u>	TMR	DFR	DMC	DTR	DOP	BDT	
GRR <u>E</u>	TOR	DGS	DMR	DTT	DMI	CAS	

Comments

OUTSTANDING VIOLATIONS COVERED BY ABOVE EVALUATION

Agency	Number	Area	Date Determined	Agency	Number	Area	Date Determined

VIOLATION Add Change Delete Link for Above Evaluation Y/N

Agency	Number	Area	Class	Regulation Type	Regulation Citation	Date Determined	Priority	Branch	Person	Returned to Compliance Scheduled	Actual

Comments

☐ Required ☐ Required if pertinent ☐ Required only for previously reported data ☐ Not Required by EPA



Pennsylvania Department of Environmental Protection

4530 Bath Pike
Bethlehem, PA 18017
July 18, 2002

Bethlehem District Office

(610) 861-2070
FAX (610) 861-2072

Hanover Township
Municipal Building
2202 Grove Road
Allentown, PA 18109

RE: B. Braun Medical, Inc.
Hanover Township
Lehigh County

Dear Mr. Pudliner:

Please find enclosed a copy of the report of an inspection performed by this District Office at B. Braun Medical, Inc. located in your municipality. A copy of the inspection report is being provided to you pursuant to the provisions of Section 1101(a)(1) of Act 101, the Municipal Waste Planning, Recycling and Waste Reduction Act of 1988.

Sincerely,

Christopher Smolar
Solid Waste Specialist
Waste Management Program

Enclosure

SP/gh

